



1900 M Street NW, Suite 250, Washington, DC 20036
(202) 296 3585

Jeffrey G. Landis
(202) 706-5203
jeff@zwillgen.com

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 2/16/2024

Via ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Defendants' pending motion to stay discovery, (Doc. 21), is also deemed moot without prejudice to refile in light of Defendants' new motion to dismiss.

Re: Consent Request to Extend Deadline to Respond to Amended Complaint and Set Briefing Schedule
Afriyie v. NBCUniversal Media LLC, Case No. 1:23-09433-VSB

Dear Judge Broderick:

My firm represents Defendants NBCUniversal Media, LLC and Peacock TV, LLC ("Defendants") in the above-referenced case. In response to this Court's February 15th Order, ECF 27, Defendants intend to file a new motion to dismiss Plaintiffs' First Amended Complaint ("FAC") such that the existing Motion to Dismiss, filed on January 19, 2024 (ECF 16-18), can be deemed moot without prejudice.

To that end, pursuant to your Honor's Individual Rules, and with consent from Plaintiffs' counsel, Defendants request an extension of Defendants' deadline to file its Motion to Dismiss Plaintiffs' FAC and to set a briefing schedule for that Motion to Dismiss. The current deadline for Defendants to respond to the FAC is February 23, 2024. One of counsel for Defendants recently tested positive for COVID and Defendants requested from Plaintiffs' counsel a 2-week extension to file its anticipated Motion to Dismiss. The parties met and conferred and agreed to a briefing schedule that would allow for sufficient time for Defendants' counsel to recover from COVID symptoms and review, analyze and appropriately respond to the FAC. Specifically, the Parties have conferred and, by agreement, request that the Court set the following schedule:

Deadline for Motion to Dismiss the FAC:	March 8, 2024
Deadline for Response to Motion to Dismiss:	April 12, 2024
Deadline for Reply in support of Motion to Dismiss:	April 19, 2024

Accordingly, Defendants respectfully submit that good cause supports this request. This is Defendants' first request for an extension of time to respond to the FAC. On December 19,

2023, the Court granted Defendants' request for an extension of time to respond to Plaintiffs' initial complaint and to set a briefing schedule on its motion to dismiss.

The Court has not yet issued a scheduling order, and this requested extension does not affect any other dates.

Sincerely,

/s/ Jeffrey Landis

Jeffrey G. Landis